

**Expat Romania BET UCITS ETF  
ISIN BGROBET05176**

ANNUAL REPORT ON THE ACTIVITY AND  
FINANCIAL STATEMENTS  
31 December 2019

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**ANNUAL REPORT ON THE ACTIVITY**  
**of “Expat Romania BET UCITS ETF” Exchange Traded Fund**  
**for the year ended 31 December 2019**  
**in accordance with Art. 39 of the Accountancy Act**

“Expat Romania BET UCITS ETF” Exchange Traded Fund (“the Fund”) is a collective open-ended investment scheme for security investments and other liquid financial assets, established and operating in accordance with the Collective Investment Schemes and Other Undertakings for Collective Investment Act (ACISOCIVA), the Public Offering of Securities Act and the regulations for its implementation, the Markets in financial instruments Act, the Law on obligations and contracts and the other applicable laws of the Republic of Bulgaria.

The Fund is a designated property for investment in securities and other liquid financial assets in view of achieving its investment objectives.

The Fund is a designated property for the purpose of collective investment in funds raised through public offering of shares in transferable securities and other liquid financial assets under Art. 38, para. 1 of the ACISOCIVA carried out by the management company with the purpose of spreading risk.

The Fund is organised and managed by the management company „Expat Asset Management” EAD.

The management company is authorised to organise and manage the Fund by the Financial Supervision Commission under authorisation dated № 165 – DF 11 December 2017. The Fund is organised in full compliance with the European Directives on UCITS.

No research and development activities were carried out during the reporting period. Expat Romania BET UCITS ETF has no branches.

The Fund is a passively managed exchange traded fund that follows the model of full physical replication of BET index of the Bucharest Stock Exchange. It is traded on the Bulgarian Stock Exchange and Frankfurt Stock Exchange (XETRA) having ROX as its ticker code.

In order to achieve the highest possible correlation with the performance of the Reference Index, the Fund invests solely in a basket of balance sheet assets comprised of shares of companies in the Reference Index. As a fund for direct replication, "Expat Romania BET UCITS ETF" may not necessarily invest in every company comprising the Reference Index, or with the exact weight of that company in the Reference Index. Successfully achieving the Fund's objective to directly replicate the Reference Index depends on the investment restrictions followed and the market conditions, including the liquidity of the Reference index.

#### **Net asset value of the Fund**

Net asset value of the Fund may not be less than BGN 500 000. This minimum amount must be reached within two years after receipt of the authorization to organize and manage the Fund, issued by the Financial Supervision Commission.

As at 31.12.2019 the total value of the assets of Expat Romania BET UCITS ETF amounts to BGN 3 092 258. The liabilities amount to BGN 2 869. The net asset value is BGN 3 089 389. The number of outstanding shares at the end of 2018 is 270 000 and by the end of 2019 the shares are 1 340 000. The realized return from the beginning of the public offering is 10.01% and in 2019 it was 34.02%.

**Risk profile**

The risk profile of the Exchange Traded Fund represents the amount and type of risk that the Management company undertakes by investing the assets of the Fund, while seeking to replicate the Reference Index, which at the date of this statement is an index of shares of BET. In this respect, investing in shares of "Expat Romania BET UCITS ETF" involves undertaking a high risk, given that the Reference Index comprises of stocks.

In its operation, "Expat Romania BET UCITS ETF" is exposed to various types of risks affecting its results. The main risks that investors shall face when they invest in shares of "Expat Romania BET UCITS ETF" are:

*Market risk*

Probability of loss occurring from adverse changes in the securities prices, market interest rates, exchange rates and other factors. This market risk affects the net asset value of the Fund, which will also vary as a result of changes in market price of shares and other securities in which the Fund has invested.

*Extreme market movements*

The market price of the financial instruments in which the Fund invests may fluctuate due to changes in the economic and market environment, monetary policy of central banks, business activity of issuers, the sector in which the issuer operates and the demand and supply of securities market. At certain times, the market price of shares (stock exchange) can change substantially. In the event of major movements of the Index, including large daily movements, the performance of the Fund may depart from its investment objectives. The revaluation of the Fund will fluctuate as a result of changes in the value of the Fund's assets and the Reference Index.

*Inability of the Management Company to adapt to market changes*

The fund follows a passive management strategy, i.e. it is not actively managed. Accordingly, the Management Company will not change the portfolio composition, except to follow closely the total return of the Reference Index. The Fund is not trying to "beat" the market and does not take defensive positions when the market falls or is perceived as overvalued. Therefore, a decline in the Reference Index may lead to a decline in the value of the Fund's assets.

*Liquidity risk*

The risk associated with the probability of losses or profits by mandatory or forced sale of assets in adverse market conditions (such as lower demand in the presence of over supply).

*Issue and redemptions*

In case the issue and redemption orders for shares are received late or do not meet the requirements of the Prospectus and the Fund's Rules, there will be a delay between the date of placing the order and the actual date of issue or redemption. Such postponements or delays may lead to a decrease in the number of shares or the amount of redemption.

*Trading on a regular market*

There can be no assurances that the shares of the Fund will be traded or that the criteria of admission to trading will not be changed. Moreover, trading of the shares on a stock exchange may be suspended under the rules of the respective exchange due to market conditions and investors may not be able to sell their shares until trading resumes.

*Regulatory risk*

The prospectus of the Fund has been prepared in compliance with the applicable laws and regulations. The Management Company and/ or the Fund and its investment objectives and policies may be affected by future changes in laws and regulations. New or modified laws, rules and regulations in Bulgaria or the European Union could prevent or significantly limit the Fund's ability to invest in certain instruments. They could also impact conclusion of agreements with certain third countries. This may affect the ability of the Fund to perform the relevant investment objectives and policies. Applying such new or modified laws, rules and regulations could lead to an increase of any or all of the Fund's costs and may require restructuring of the Fund, in order to meet the new rules. Such a probable restructuring may include restructuring costs. When restructuring is not possible, the Fund may proceed to termination. The assets of the Fund and the Reference index are subject to change in laws or regulations, and such a change might affect their value and/ or liquidity.

#### *Operational risk*

It is associated with the likelihood of loss resulting from errors or system failures in the organisation, insufficiently qualified personnel and unfavourable external events that are not financial in nature, incl. legal risk.

#### *Risk of error in tracking the Reference Index*

Tracking the Reference Index by investing in all positions of the index can be costly and difficult to implement. Portfolio managers can use optimisation techniques, such as selection of individual positions in the Index in proportions that differ from those in the Index. The use of such optimisation techniques can increase the error in tracking and lead to a different performance of the Fund towards the Index. Furthermore, existing restrictions or future changes in laws and regulations of the Exchange Traded Fund, related but not limited to the composition, concentration and method of measurement of assets, can lead to inability of the Fund to replicate the index in full. In addition, exchange traded funds on markets characterised by low liquidity are exposed to a greater risk of error in tracking an index.

#### *Reference index*

If there is an event that affects the Index, the Fund may be required to suspend the issue and redemption of shares. The revaluation of the Fund may also be affected. In case of continuing problems with the Index, the Fund will take appropriate actions, which may reduce the net asset value of the Fund.

#### *Systemic risks*

Systemic risks depend on general fluctuations in the economy and the markets in general. The Fund is unable to influence the systemic risks but will take them into account and will comply with them. Risks arising from political and economic situation are a possible instability or military action in the region. Disasters and accidents are factors complicating any system of risk management. The consequences are hard to predict, but access to information and applying a system of forecasting and actions in extreme situations are possible ways to mitigate the negative effect.

#### *Risk profile and risk management*

The Fund's risk profile may be changed only with the approval of the Financial Supervision Commission as reflected in the Prospectus and Fund Rules. The risk profile of the Fund during the reporting period remains unchanged. The main risks associated with the Fund's operations are detailed in the Prospectus published on the Management Company's website. The management does not expect any other type of risks or uncertainties, other than those presented in the Prospectus, to affect the Fund's activities.

#### *Structure and percentage of key activity indicators*

*Structure of assets and liabilities*

The Fund's assets structure is presented in absolute value and as a percentage of total assets by the end of 2019 and 2018.

<b>Assets</b>	<b>As of 31.12.2019</b>	<b>%</b>	<b>As of 31.12.2018</b>	<b>%</b>
Cash	579 566	18,74%	36 511	7,88%
Shares	2 512 692	81,26%	426 633	92,12%
<b>Total assets</b>	<b>3 092 258</b>	<b>100,00%</b>	<b>463 144</b>	<b>100,00%</b>

The Fund's total liabilities at the end of 2019 amounted to BGN 2 869, representing liabilities to the Custodian Bank (CB), the Management Company (MC) and other liabilities.

<b>Liabilities</b>	<b>As of 31.12.2019</b>	<b>%</b>	<b>As of 31.12.2018</b>	<b>%</b>
Liabilities to CB	543	0,02%	278	0,06%
Liability to MC	2 326	0,07%	424	0,09%
<b>Total liabilities</b>	<b>2 869</b>	<b>0,09%</b>	<b>702</b>	<b>0,15%</b>
<b>Total liabilities</b>	<b>3 092 258</b>	<b>100,00%</b>	<b>463 144</b>	<b>100,00%</b>

The liabilities to Custodian Bank and Management Company are charged on a daily basis in accordance with the Fund's Portfolio Valuation Rules, which are approved by the FSC.

*Operating results*

The operating expenses of the Fund are shown in the following table:

<b>Type of expenses</b>	<b>2019</b>	<b>%</b>	<b>2018</b>	<b>%</b>
Loss from operations and remeasurement of financial assets	30	0,03%	137 326	78,88%
Expenses associated with foreign currency operations	73 573	65,12%	17 579	10,10%
Other financial expenses	14 191	12,56%	11 236	6,45%
External services expenses	25 183	22,29%	7 951	4,57%
<b>Total expenses</b>	<b>112 977</b>	<b>100,00%</b>	<b>174 092</b>	<b>100,00%</b>

The operating income of the Fund is shown on the following table:

<b>Type of income</b>	<b>2019</b>	<b>%</b>	<b>2018</b>	<b>%</b>
Income from dividends	38 932	15,20%	38 885	35,86%
Income from operations and remeasurement of financial assets	162 608	63,51%	69 347	63,96%
Income associated with foreign currency operations	54 504	21,29%	195	0,18%

<b>Total income</b>	<b>256 044</b>	<b>100,00%</b>	<b>108 427</b>	<b>100,00%</b>
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The operating results of the Fund for 2019 and 2018 are shown in the table below:

	<b>2019</b>	<b>2018</b>
Income	256 044	108 427
Expenses	112 977	174 092
<b>Net result</b>	<b>143 067</b>	<b>(65 665)</b>

During the reporting period, there were no internal events affecting the exchange traded fund and the Management Company's operations and results.

As a collective investment scheme, the Fund may not carry out and did not carry out transactions with group companies, according to the ACISOCIVA restrictions.

No repo transactions have been carried out by the Fund during the reporting period.

"Expat Capital" AD is the main shareholder in MC "Expat Asset Management" EAD. No changes in the managers have occurred during the reporting period but the member of the Board of Directors of the management company, Lachezar Dimov, left the Board of Directors.

Following are the managing representatives and members of the Board of Directors of "Expat Asset Management" EAD as of 31.12.2019:

1. Nicola Simeonov Yankov
2. Nikolay Vassilev Vassilev
3. Daniel Penov Donchev
4. Maria Dimitrova Boychinova
5. Nikola Emilov Veselinov

The following information required under Art. 39 of the Accountancy Act is not applicable to an exchange-traded fund:

- future development of the undertaking
- information under Art. 247 of the Commerce Act
- actions in the field of research and development and ecology
- information about buy-back of own shares
- economic policy scheduled for the following year
- expected investments and staff development
- expected income from investments and company development
- forthcoming transactions that are essential for the Company's operations
- branches of the undertaking
- the Fund is not subject to the requirements of Art. 41 of the Accountancy Act and is not obliged to provide a non-financial statement.

*Information on pending court, administrative or arbitration proceedings referring to liabilities or receivables*

The management has no information on the existence of such receivables or liabilities.

*Events after the reporting date*

By decision of the sole owner of the capital of Expat Asset Management EAD from 09.01.2020, Nikola Emilov Veselinov was dismissed as a member of the Board of Directors of Expat Asset Management EAD. The change was entered in the Commercial Register on 16.01.2020. By decision of the sole owner of the capital of Expat Asset Management EAD from 16.03.2020, Maria Dimitrova Boychinova was dismissed as a member of the Board of Directors of Expat Asset Management EAD. The change was entered in the Commercial Register on 27.03.2020. No new members of the Board of Directors were elected.

**COVID 19 – Global pandemic**

Expat Asset Management EAD has long been using cloud-based information systems and resources in the Internet. This includes the COMENS system for operations registration and portfolio management (both trustees and funds), Microsoft's cloud-based corporate electronic communications services (e-mail, chatrooms, online conference calls, file sharing), cloud file servers as well as online platforms for electronically signing documents. All company employees have personal electronic signatures, issued by Evrotrust, that can sign documents at any time from laptops, mobile phones or tablets. All employees of the company have “smart” phones with corporate e-mail installed, Microsoft OneDrive file sharing system, Viber and Skype chat and video conferencing programs, and the Evrotrust electronic signature application. The Portfolio Management department has two mobile subscriptions for Bloomberg Anywhere terminals, that can monitor the markets at any time from anywhere from a tablet, laptop or mobile phone, as well as give orders to buy and sell financial instruments to the company's investment intermediaries worldwide.

Since the announcement of a state of emergency in Bulgaria, the company has been working with a reduced staff in the office, only the “Portfolio management” staff are on duty. The other employees work remotely from their homes without any problems, as this does not in any way halt the work of managing clients and funds portfolios, does not in any way disrupt the communication with clients and counterparties. There are limited meetings with outsiders in the office, but the company has made available to its clients the possibility to sign documents electronically, with all documents submitted in Eurotrust, which guarantees the identity of the counterparty. The company can also open remote investment accounts (sign trust agreements) for new clients by setting up a portal through its website. A procedure for remote electronic collection of necessary information and documentation, and identification and authentication of new customers has been established. Risk management monitoring of all processes and results in managing trust and equity portfolios continues uninterrupted.

Expat Asset Management does not expect directly significant impact of the COVID-19 epidemic on its operations and financial position. If the epidemic leads to a deep and prolonged global recession, leading to a significant decline in financial markets, it could worsen the company's revenue prospects and profits - as well as that of any other firm in the sector - in the medium-term.

For the purposes of the 2019 Annual Financial Statement, the management estimates the effect of Covid-19 as a non-adjusting event, occurring after the balance sheet date.

The performance of the Fund (as measured by the change of the “net asset position per share or per unit”) is directly affected by the price movement of financial instruments in the Fund's portfolio. In this sense, if the global economic crisis created by the measures against COVID-19, affects negatively the financial markets and especially the market prices of the instruments in the portfolio of the fund, this will also adversely affect the performance of the fund. This is a purely market risk that is properly described in the prospectus of the Fund and is not operational or extraordinary. The duration and depth of the financial crisis caused by the measures against COVID-19 cannot be predicted. It can be predicted that the market risk, measured as volatility in global financial market prices, will increase. Outside of increasing market risk, the COVID-19 situation is not expected to have any other impact on the Fund's operations and results.

**Annual report on the activity  
of “Expat Romania BET UCITS ETF” Exchange Traded Fund  
for the year ended 31 December 2019  
(continued)**

*Report on tracking error according to Art. 82f of Ordinance No. 44 of October 20, 2011 on the Requirements to the Activities of Collective Investment Schemes, Management Companies, National Investment Funds and Alternative Investment Fund Managers.*

<b>ISIN</b>	<b>Name of the exchange traded fund</b>	<b>Anticipated tracking error for 2020</b>	<b>Realized tracking error as of 31.12.2019</b>
BGROBET05176	Expat Romania BET UCITS ETF	up to 10%	4.11%*

<b>ISIN</b>	<b>Name of the exchange traded fund</b>	<b>Return of ETF for 2019</b>	<b>Return of Index for 2019</b>	<b>Tracking difference for 2019</b>
BGROBET05176	Expat Romania BET UCITS ETF	34.02%	31.40%	2.62%

\*The realized tracking error is calculated on a weekly basis for 52 weeks prior to 31.12.2019.

For 2020, we expect the tracking error to not exceed 10% in view of the limited history of trading in exchange traded funds on the Bulgarian market and respectively on the Exchange Traded Fund "Expat Romania BET UCITS ETF".

Tracking error is the volatility (measured by the annualized standard deviation) of the difference between the annual return of the Fund and the annual return of the Index itself. A lower tracking error means a closer tracking of the Index. This is not the same as a difference in tracking, which is simply the difference between the return of the Fund and that of the Reference Index over a certain period. The difference in tracking shows how the Fund has performed relative to the Index, while the tracking error shows the sustainability of the difference in performance between the Fund and the Reference Index

Date: 01.04.2020

Nikolay Vassilev  
CEO

Daniel Donchev  
Member of the Board of Directors

**CORPORATE GOVERNANCE STATEMENT**

This declaration is made on the basis of article 40 of the Accountancy Act, according to the requirements of the Public Offering of Securities Act

**General**

Expat Romania BET UCITS ETF (Fund) is a passively managed fund and adheres to the method of full physical replication of the BET index. It is admitted to trading on the Bulgarian Stock Exchange and Frankfurt Stock Exchange (XETRA) with a ticker code ROX. The Fund's activity covers the subscription and redemption of shares entitling their holders to the same rights. The number of shares of the Fund changes depending on the volume of sales and redemption of shares. Under the Additional provisions of the Accountancy Act, the Funds is an entity of public interest. In this capacity the Fund presents the corporate governance statement as part of the annual financial statements.

The Fund is organized and managed by the Management Company Expat Asset Management EAD (the "Management Company"). The Fund is managed by following the Prospectus and the Rules of the Fund, as well as all the Rules, Policies and Internal provisions of the Management Company, and the Corporate governance code approved by the Chairman of the Bulgarian Financial Supervision Commission. The Fund does not possess its own administrative, management and supervisory bodies. The Fund is registered in the Bulstat Register at the Registry Agency under BULSTAT code 177234223. The registered office of the Fund and the Management Company is Sofia, Postal code 1000, 96A "Georgi S. Rakovski" str.

**Key features of internal control and risk management systems**

The internal control system applied by Expat Asset Management in the management of the Fund includes the following components:

- *Control environment* covers the following elements – organizational structure, conferral of powers and responsibilities, commitments of persons entrusted with general management, commitment to competence, policies and practices related to human resources, philosophy and operational style of leadership, values and ethical behavior
- *Risk assessment* – In managing the Fund, the Management Company uses strictly defined limits described in the Fund's Rules and Prospectus
- *Information system* – The information system related to the financial reporting of the Fund should be seen as a collection of all rules, processes and procedures of the Fund and the Management Company
- *Control activities* – Effective control over the preparation of the financial statements of the Fund, is one of the priorities of the management of the Management Company
- *Current monitoring of controls* – At Management company level there is an internal control department and compliance, which conducts reviews of the activities, ongoing and periodic reviews of the system and processes. Checks by the internal control are aimed at establishing compliance with the legal and the internal rules and procedures.

**Information under Art. 10 1, (c), (d), (f), (h) and (i) of Directive 2004/25/EC of the European Parliament and of the Council of 21 April 2004 on takeover bids**

- *Information on B. c)- Significant direct or indirect shareholdings (including indirect shareholdings through pyramid structures and cross-shareholdings) within the meaning of Article 85 of Directive 2001/34/EC:*  
During the reporting period, the Fund did not receive notifications of acquired or sold directly or through intermediary's partitions meeting the criteria specified in art. 89, par. 1 of Directive 2001/34/EC, relating to changes in voting rights held.

- *Information on B. d)- The holders of all securities with special control rights and a description of those rights-* There are no shareholders with special control rights.
- *Information on B. f)- Any restrictions on voting rights, such as restrictions on the voting rights of holders of a certain percentage or number of votes, deadlines for exercising the voting rights or systems through which, through Cooperation with the company, the financial rights granted to the securities are separate from the holding of the securities -* There are no restrictions on voting rights on partitions.
- *Information on the B. h)-The rules governing the appointment or replacement of board members and amendments to the Memorandum of Association*  
The fund does not have its own management bodies. The fund is organized and operated by the Management Company Expat Asset Management.
- *Information on B. i)-The powers of the members of the Board, and in particular the right to issue or buy back shares.*
- The fund may issue and redeem shares on a daily basis in accordance with the Rules and the Prospectus.

Date: 01.04.2020

Nikolay Vassilev  
CEO

Daniel Donchev  
Member of the Board of Directors



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## Independent auditor's report

To the unit holders

In Exchange-traded fund Expat Romania BET UCITS ETF

### Report on the Audit of the Financial Statements

#### Opinion

We have audited the accompanying financial statements of Exchange-traded Fund Expat Romania BET UCITS ETF (the Fund), which comprise the statement of financial position as at 31 December 2019, and the statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Fund as at 31 December 2019, and of its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union (EU).

#### Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Fund in accordance with the International Ethics Standards Board for Accountants' *International Code of Ethics for Professional Accountants (including International Independence Standards)* (IESBA Code) together with the ethical requirements of the Independent Financial Audit Act (IFAA) that are relevant to our audit of the financial statements in Bulgaria, and we have fulfilled our other ethical responsibilities in accordance with the requirements of the IFAA and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Translation in English of the official Auditor's report issued in Bulgarian.

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## Emphasis of Matter

We draw attention to Note 17 Events after the reporting date to the financial statements which discloses significant non-adjusting event related to coronavirus pandemic (COVID-19). The disruption of the normal economic activity in Europe resulting from COVID-19 may affect adversely the operations of the Fund, in particular, as a result of increased market volatility. Due to the unpredictable dynamic of COVID-19, it is not practicable to provide a reliable estimate of the potential effects of the pandemic. Our opinion is not modified in respect of this matter.

## Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

We have fulfilled the responsibilities described in the *Auditor's responsibilities for the audit of the financial statements* section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying financial statements.

Key audit matter	How our audit addressed the key audit matter
<i>Book value of financial assets at Fair value through profit and loss</i> The Fund's disclosures about the financial assets at fair value through profit and loss are included in Note 6 to the financial statements	
As at 31 December 2019 the Fund reports BGN 2,513 thousand financial assets at Fair value through profit and loss comprising of non-controlling equity participations in public companies, as disclosed in Note 6 to the financial statements. They are owned by the Fund as a result of replication of the index BET and the fair value is determined by reference to published price quotations. The book value of the financial assets at Fair value through profit and loss is a main factor	In this area, our audit procedures included, amongst others: <ul style="list-style-type: none"><li>• We obtained understanding and performed walk throughs of the process for valuation of financial assets at fair value through profit and loss.</li><li>• We performed check for the existence of the financial assets through profit and loss by comparison to the obtained confirmation letter from the Bank depository as at 31 December 2019, as</li></ul>



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in the determination of the Fund's net assets value as at the reporting date and therefore has a significant effect on the financial parameters which are based on its movement.

Due to the significant amount of the financial assets at Fair value through profit and loss in relation to the financial statements as a whole, and the fact that the valuation of the assets is the key driver for the Fund's net assets value, and the financial result for the year, we consider this matter as key audit matter.

well as by analyzing if the public companies in which the Fund has shares replicate the index BET as at the end of the reporting period.

- We performed check for the valuation of the financial assets through profit and loss by Independent check of the prices in the portfolio as at 31 December 2019 to publicly available market data, as well as by testing of the technical accuracy of the calculations of the fair value and the movements, reported in the profit and loss for the period.
- We assessed the adequacy and relevance of the financial statement disclosures related to the financial assets at fair value through profit and loss.

### **Information Other than the Financial Statements and Auditor's Report Thereon**

Management is responsible for the other information. The other information, which we have obtained prior the date of our auditor's report, comprises the management report, including the corporate governance statement prepared by management in accordance with Chapter Seven of the Accountancy Act, but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon, unless and to the extent explicitly specified in our report.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.



## **Responsibilities of Management and Those Charged with Governance for the Financial Statements**

Management is responsible for the preparation and presentation of the financial statements that give a true and fair view in accordance with IFRS, as adopted by the EU, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Fund or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Fund's financial reporting process.

## **Auditor's Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.



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- Conclude on the appropriateness of management’s use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Fund’s ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor’s report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor’s report. However, future events or conditions may cause the Fund to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves true and fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor’s report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

## **Report on Other Legal and Regulatory Requirements**

### ***Additional Matters to be Reported under the Accountancy Act and the Public Offering of Securities Act***

In addition to our responsibilities and reporting in accordance with ISAs, described above in the *Information Other than the Financial Statements and Auditor’s Report Thereon* section, in relation to the management report, including the corporate governance statement, we have also performed the procedures added to those required under ISAs in accordance with the Guidelines on New and Expanded Auditor’s Reports and Auditor’s Communication of the professional organisation of certified public accountants and registered auditors in Bulgaria, i.e. the Institute of Certified Public Accountants (ICPA). These procedures refer to testing the existence, form and content of this other information to assist us in forming opinions about whether the other information includes the disclosures and reporting provided for in Chapter Seven of the Accountancy Act and in the Public Offering of Securities Act (Art. 100m, paragraph



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10 of the POSA in conjunction with Art. 100m, paragraph 8(3) and (4) of the POSA) applicable in Bulgaria.

*Opinion in connection with Art. 37, paragraph 6 of the Accountancy Act*

Based on the procedures performed, our opinion is that:

- a) The information included in the management report referring to the financial year for which the financial statements have been prepared is consistent with those financial statements.
- b) The management report has been prepared in accordance with the requirements of Chapter Seven of the Accountancy Act and of Art. 100(m), paragraph 7 of the Public Offering of Securities Act.
- c) The corporate governance statement referring to the financial year for which the financial statements have been prepared presents the information required under Chapter Seven of the Accountancy Act and Art. 100 (m), paragraph 8 of the Public Offering of Securities Act.

*Opinion in connection with Art. 100(m), paragraph 10 in conjunction with Art. 100 m, paragraph 8(3) and (4) of the Public Offering of Securities Act*

Based on the procedures performed and the knowledge and understanding obtained about entity's activities and the environment in which it operates, in our opinion, the description of the main characteristics of entity's internal control and risk management systems relevant to the financial reporting process, which is part of the management report (as a component of the corporate governance statement) and the information under Art. 10 paragraph 1(c), (d), (f), (h) and (i) of Directive 2004/25/EC of the European Parliament and of the Council of 21 April 2004 on Takeover Bids, do not contain any material misrepresentations.



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***Additional Reporting on the Audit of the Financial Statements in connection with  
Art. 100(m), paragraph 4(3) of the Public Offering of Securities Act***

*Statement in connection with Art. 100(m), paragraph 4(3)(b) of the Public Offering of Securities Act*

The information about related party transactions is disclosed in Note 11 to the financial statements. Based on the audit procedures performed by us on related party transactions as part of our audit of the financial statements as a whole, no facts, circumstances or other information have come to our attention based on which to conclude that the related party transactions have not been disclosed in the accompanying financial statements for the year ended 31 December 2019, in all material respects, in accordance with the requirements of IAS 24 *Related Party Disclosures*. The results of our audit procedures on related party transactions were addressed by us in the context of forming our opinion on the financial statements as a whole and not for the purpose of expressing a separate opinion on related party transactions.

*Statement in connection with Art. 100(m), paragraph 4(3)(c) of the Public Offering of Securities Act*

Our responsibilities for the audit of the financial statements as a whole, described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report include an evaluation as to whether the financial statements present the significant transactions and events in a manner that achieves true and fair presentation. Based on the audit procedures performed by us on the significant transactions underlying the financial statements for the year ended 31 December 2019, no facts, circumstances or other information have come to our attention based on which to conclude that there are material misrepresentations and disclosures in accordance with the relevant requirements of IFRS as adopted by the EU. The results of our audit procedures on Fund's transactions and events significant for the financial statements were addressed by us in the context of forming our opinion on the financial statements as a whole and not for the purpose of expressing a separate opinion on those significant transactions.



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***Reporting in accordance with Art. 10 of Regulation (EU) No 537/2014 in connection with the requirements of Art. 59 of the Independent Financial Audit Act***

In accordance with the requirements of the Independent Financial Audit Act in connection with Art. 10 of Regulation (EU) No 537/2014, we hereby additionally report the information stated below.

- Ernst & Young Audit OOD was appointed as a statutory auditor of the financial statements of Exchange-traded Fund Expat Romania BET UCITS ETF (the Fund) for the year ended 31 December 2019 by decision of the Sole owner of the capital of Expat Asset Management EAD held on 25 April 2019 for a period of one year.
- The audit of the financial statements of the Fund for the year ended 31 December 2019 represents first total uninterrupted statutory audit engagement for that Fund carried out by us.
- We hereby confirm that the audit opinion expressed by us is consistent with the additional report, provided to those charged with governance of the Fund, in compliance with the requirements of Art. 60 of the Independent Financial Audit Act.
- We hereby confirm that we have not provided the prohibited non-audit services referred to in Art. 64 of the Independent Financial Audit Act.
- We hereby confirm that in conducting the audit we have remained independent of the Fund.

Audit Firm Ernst & Young Audit OOD:

Nikolay Garnev

Legal Representative and Registered Auditor in charge of the audit

Sofia, Bulgaria

3 April 2020

**Statement of Comprehensive Income**

**For the year ended 31 December 2019**

<i>BGN'000</i>	<i>Note</i>	<b>01.01.2019 – 31.12.2019</b>	<b>01.01.2018- 31.12.2018</b>
Other income	3	39	39
Net loss from financial assets, held at fair value through profit and loss	6	163	(68)
Net loss from foreign currency transactions		(19)	(18)
Operating expenses	4	(40)	(19)
<b>Operating income/(loss) for the period</b>		<b>143</b>	<b>(66)</b>
Tax expenses	10	-	-
<b>Income/(loss) for the period</b>		<b>143</b>	<b>(66)</b>
Other income		-	-
<b>Total income for the period</b>		<b>143</b>	<b>(66)</b>
<b>Net income per share</b>			
<b>Net income/(loss) per share (in BGN)</b>	8	<b>0.422</b>	<b>(0.286)</b>

Date: 01.04.2020

Approved by:

Prepared by:

Nikolay Vassilev  
CEO

Tatiana Lazarova  
Head of Accounting

Daniel Donchev

Member of the Board of Directors

The financial statements have been approved for issue by decision of the Board of Directors of the Management Company dated 01.04.2020.

The notes from page 13 to page 36 are integral part of the annual financial statements.

Financial Statements on which the auditing company Ernst & Young Audit OOD, registration number 108, has issued an auditor's report dated 03.04.2020, with Legal Representative and Registered Auditor in charge Nikolay Garnev.

**Statement of Financial Position**

**as at 31.12.2019**

<i>BGN'000</i>	<i>Note</i>	<b>31.12.2019</b>	<b>31.12.2018</b>
<b>Assets</b>			
Cash and cash equivalents	5	579	36
Financial assets held at fair value through profit and loss	6	2 513	427
<b>Total assets</b>		<b>3 092</b>	<b>463</b>
<b>Equity and liabilities</b>			
<b>Equity</b>			
Subscribed capital		2 621	528
Share premium account		392	1
Accumulated loss		76	(67)
<b>Total equity</b>	<b>7</b>	<b>3 089</b>	<b>462</b>
<b>Liabilities</b>			
Trade and other liabilities	9	3	1
<b>Total liabilities</b>		<b>3</b>	<b>1</b>
<b>Total equity and liabilities</b>		<b>3 092</b>	<b>463</b>

Date: 01.04.2020

Approved by:

Prepared by:

Nikolay Vassilev  
CEO

Tatiana Lazarova  
Head of accounting

Daniel Donchev  
Member of the Board of directors

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**Statement of Changes in Equity**  
for the year ended 31 December 2019

<i>BGN'000</i>	<i>Note</i>	<b>Share capital</b>	<b>Share premium account</b>	<b>Profit and Loss</b>	<b>Total</b>
<b>On 1 January 2018</b>		<b>118</b>	<b>-</b>	<b>(1)</b>	<b>117</b>
<b>Other income</b>					
Loss for the period		-	-	(66)	(66)
<b>Total income</b>		<b>-</b>	<b>-</b>	<b>(66)</b>	<b>(66)</b>
<b>Contributions from and allocations to owners</b>					
Issue of new shares		469	1	-	470
Redemption of shares		(59)	-	-	(59)
<b>Total contributions from and allocations to owners</b>		<b>410</b>	<b>1</b>	<b>-</b>	<b>411</b>
<b>Balance on 31 December 2018</b>	<b>7</b>	<b>528</b>	<b>1</b>	<b>(67)</b>	<b>462</b>
<b>On 1 January 2019</b>		<b>528</b>	<b>1</b>	<b>(67)</b>	<b>462</b>
<b>Other income</b>					
Loss for the period		-	-	143	143
<b>Total income</b>		<b>-</b>	<b>-</b>	<b>143</b>	<b>143</b>
<b>Contributions from and allocations to owners</b>					
Issue of new shares		2 269	415	-	2 684
Redemption of shares		(176)	(24)	-	(200)
<b>Total contributions from and allocations to owners</b>		<b>2 093</b>	<b>391</b>	<b>-</b>	<b>2 484</b>
<b>Balance on 31 December 2018</b>	<b>7</b>	<b>2 621</b>	<b>392</b>	<b>76</b>	<b>3 089</b>

Date: 01.04.2020

Approved by:

Nikolay Vassilev  
CEO

Daniel Donchev  
Member of the Board of Directors

Prepared by:

Tatiana Lazarova  
Head of Accounting

The financial statements have been approved for issue by decision of the Board of Directors of the Management Company dated 01.04.2020.

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**Cash Flow Statement**

for the year ended 31 December 2019

BGN'000

	Note	01.01.2019- 31.12.2019	01.01.2018 – 31.12.2018
<b>OPERATING CASH FLOW</b>			
Dividends received		39	39
Income associated with financial assets held at fair value through profit and loss		-	82
Payments associated with financial assets held at fair value through profit and loss		(1 932)	(577)
Payments associated with currency transactions		(35)	(18)
Payments to counterparties		(4)	(16)
Other operating payments		(6)	(2)
<b>Net cash flow for operating activity</b>		<b><u>(1 938)</u></b>	<b><u>(492)</u></b>
<b>CASH FLOW FROM FINANCING ACTIVITY</b>			
Income from issue of shares		2 684	470
Payments for buyback of shares		(200)	(59)
Payments to counterparties from financing activities		(3)	(1)
<b>Net cash flow from financing activity</b>		<b><u>2 481</u></b>	<b><u>410</u></b>
<b>Net decrease/increase of cash and cash equivalents</b>		<b><u>543</u></b>	<b><u>(82)</u></b>
Cash and cash equivalents on 1 January		36	118
<b>Cash and cash equivalent on 31 December</b>	<b>5</b>	<b><u>579</u></b>	<b><u>36</u></b>

Date: 01.04.2020

Approved by:

Prepared by:

Nikolay Vassilev  
CEO

Tatiana Lazarova  
Head of Accounting

Daniel Donchev

Member of the Board of Directors

The financial statements have been approved for issue by decision of the Board of Directors of the Management Company dated 01.04.2020.

The notes from page 13 to page 36 are integral part of the annual financial statements.

**Notes to the Annual financial statements****1. Status and scope of activity**

Expat Romania BET UCITS ETF ("the Fund") is an exchange-traded fund organised and managed by the Management Company "Expat Asset Management" EAD (the "Management Company"). The Fund is registered in the Bulstat Register at the Registry Agency under BULSTAT code 177234223. The registered office of the Fund and the Management Company is in Sofia, Postal code 1000, 96A, "Georgi S. Rakovski" St.

Expat Romania BET UCITS ETF is a passively managed fund and adheres to the method of full physical replication of the BET index. It is registered for trading on the Bulgarian Stock Exchange - Sofia, the London Stock Exchange and the Frankfurt Stock Exchange (XETRA) under ROX stock exchange ticker. The Fund's activity covers the issue and sale of shares offering the same rights to their holders. The number of shares in the Fund changes depending on the volume of sales and redemption of shares.

Shares of the Fund may be redeemed at the request of investors.

Since the Fund does not have its own management bodies, the persons charged with the governance of the Fund are the members of the Board of Directors of the Management Company.

**2. Basis of preparation****(a) Statement of compliance**

The financial statements of the Fund have been prepared in accordance with the International Financial Reporting Standards adopted by the European Union (IFRS, adopted by EU). The IFRS Accounting Framework adopted by the EU is essentially the defined national accounting IAS adopted by the EU, regulated by the Accountancy Act and defined in paragraph 8 of its Additional Provisions.

The Fund was registered on 4 January 2018. These statements contain comparative information for the period 4 January – 31 December 2018.

The line items in the statement of financial position are presented in order of their liquidity.

These financial statements are prepared using the historical cost method except for financial assets at fair value through profit or loss that are measured at fair value.

**(b) Functional and reporting currency**

The shares of the Fund are issued in EUR, the net asset value per share and redemption price are calculated in EUR. For this reason, the functional currency of the Fund is EUR.

These financial statements are presented in Bulgarian leva (BGN), which is the functional currency of the Fund. All financial information in BGN is rounded to one thousand unless otherwise stated.

From 1 January 1999 the exchange rate of the Bulgarian lev (BGN) is pegged to the euro (EUR). For this reason, there are no currency translation differences arising from the use of the BGN as a presentation currency in these financial statements. The exchange rate is BGN 1.95583 / EUR 1.0.

**(c) Estimates and judgements**

The preparation of financial statements under IFRS requires the Management Company to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. The actual result may be different from these estimates.

The review of the accounting estimates is recognised in the period in which the measurement is reviewed when the review affects that period, and in future periods if the review affects future periods.

**2. Basis of preparation (continued)**

**(c) Estimates and judgements (continued)**

***Judgements***

Information on significant judgments made in applying the accounting policies that have the most significant effect on the presentation of the amounts in the financial statements is included in the following notes:

- Note 7 Equity – classification of the Fund's shares as an equity instrument.

***The Fund as an investment entity within the meaning of IFRS 10***

Companies that meet the definition of an IFRS 10 Investment entity are required to report investments in subsidiaries at fair value instead of consolidating them. The criteria that define an Investment entity are:

- A company raising funds from one or more investors for the purpose of providing the relevant investment services;
- A company with a business purpose only to increase the value of the capital, investment income or both;
- A company that recognizes and evaluates a significant portion of its investments at fair value.

The Fund invests primarily in shares and investors are not group companies, which is an additional characteristic of an investment entity.

The management company believes that the Fund meets the above criteria and characteristics and falls within the definition of an investment entity. The judgment is reviewed regularly in case of change in circumstances.

The Management Company believes that the Fund does not control the investments in shares and therefore does not consolidate them.

***Fair values measurement***

Some of the accounting policies and disclosures of the Fund require fair values to be measured for financial and non-financial assets and liabilities.

When measuring the fair value of an asset or liability, the Fund uses observable data as far as possible. Fair values are categorised at different levels in the fair value hierarchy based on incoming data in measurement techniques as follows:

- Level 1: quoted prices (uncorrected) in active markets for similar assets or liabilities.
- Level 2: Inputs other than quoted prices included in Level 1 that are directly (i.e. as prices) or indirectly (i.e. derived from prices) available for observation of the asset or liability.
- Level 3: Inputs for the asset or liability that are not based on observable market data (unobservable inputs).

If the inputs used to measure the fair value of an asset or liability fall into different levels of the fair value hierarchy, then the fair value measurement is categorised in its entirety at the level of the fair value hierarchy whose input is relevant to the overall measurement.

Information on significant items that are affected by estimates and assumptions when applying the accounting policies that have the most significant effect on the amounts recognised in these financial statements is included in Note 12 Financial Instruments.

**3. Income**

<i>BGN'000</i>	<b>01.01.2019 – 31.12.2019</b>	<b>01.01.2018 – 31.12.2018</b>
Income from dividends	39	39
<b>Total income</b>	<b>39</b>	<b>39</b>

**4. Operating expenses**

<i>BGN'000</i>	<b>01.01.2019 - 31.12.2019</b>	<b>01.01.2018 – 31.12.2018</b>
Fees to stock exchanges and regulators	23	8
Fees and commissions to custodian bank	7	7
Fees and commissions to Management Company	7	4
Audit	3	-
<b>Total operating expenses</b>	<b>40</b>	<b>19</b>

The management company incurred expenses for set-up and administration of the fund in the amount of BGN 5 thousand, which are not included in the net asset value as of 31.12.2019. These expenses are owed to the MC and will be expensed in the net asset value on a future date. The Management Company has followed such a policy that it minimises the total expenses of the Fund at the starting point when the Fund size is relatively small.

**5. Cash and cash equivalents**

<i>BGN'000</i>	<b>31.12.2019</b>	<b>31.12.2018</b>
Cash in BGN in bank accounts	579	36
<b>Cash and cash equivalents</b>	<b>579</b>	<b>36</b>
<b>Cash and cash equivalents in Cash flow statement</b>	<b>579</b>	<b>36</b>

The Fund's cash is kept with the custodian bank – Eurobank Bulgaria AD.

***Changes in liabilities, arising from financial activities***

The Fund doesn't have long-term liabilities at amortized cost, in which it reports accrued interest at an effective interest rate that differs from the agreed interest rates. Therefore, it does not present such changes in the "Cash Flows from Financing Activity" in the Cash Flow Statement for the year ended on 31 December 2019 and 31 December 2018.

**6. Financial assets held at fair value through profit and loss**

<i>В хиляди лева</i>	2019	2018
<b>Financial assets at fair value through profit and loss</b>		
Quoted shares	2 513	247
<b>Financial assets held at fair value in other income</b>		
Unquoted shares	-	-
Quoted debt instruments	-	-
<b>Total financial assets at fair value</b>	<b>2 513</b>	<b>247</b>

*Financial assets at fair value through profit or loss* in Expat Romania BET UCITS ETF include non-controlling interests in public companies operating in the Romania. Expat Romania BET UCITS ETF is a passively managed fund and adheres to the method of full physical replication of the BET index. The reference index is BET, consisting of shares denominated and traded in Romanian leu. The fair values of those shares in equity are determined by reference to published price quotations in active market.

When measuring the fair value of an asset or liability, the Fund uses observable data as far as possible. Fair values are categorised in Level 1 (Quoted Market Prices in Active Markets) in the fair value hierarchy based on inputs in measurement techniques.

The value of the financial assets in the balance sheet at the reporting date is determined as the closing price of the respective asset on the Bucharest Stock Exchange on the last working day of the respective reporting period.

The structure of the Fund's financial assets measured at fair value through profit and loss as at 31 December 2019 and 31 December 2018 is as follows:

<b>Financial instrument type</b>	Shares		
<b>Regulated market on which they are traded</b>	Фондова борса Букурещ		
<b>Issuer</b>	<b>Number</b>	<b>Amount at the end of reporting period, BGN</b>	<b>Percentage of the total amount of assets</b>
Conpet SA Ploiesti	320	10 416	0.34%
Digi Communications NV	4 500	61 460	1.99%
Transgaz SA Medias	899	132 341	4.28%
Societatea Nationala Nuclear	9 360	54 579	1.77%
Transelectrica SA	5 220	42 157	1.36%
Med Life SA	1 650	22 940	0.74%
Sphera Franchise Grouer SA	1 810	13 914	0.45%
Purcari Wineries PLC	1 400	12 709	0.41%
Societatea Energetica Electrica	21 506	93 657	3.03%
OMV Petrom SA	2 628 100	480 375	15.53%
SC Fondul Proprietatea SA	1 002 480	496 012	16.04%
Banca Transilvania SA	459 617	487 713	15.77%
BRD-Groupe Societe Generale	43 170	279 620	9.04%
ALRO SA	39 200	37 509	1.21%
Societatea Nationala De Gaze	17 915	271 782	8.79%
Bursa de Valori Bucuresti SA	1 470	15 508	0.50%
<b>TOTAL</b>	<b>4 238 617</b>	<b>2 512 692</b>	<b>81.25%</b>

**6. Financial assets held at fair value through profit and loss (continued)**

<b>Financial instrument type</b>	<b>Shares</b>		
<b>Regulated market on which they are traded</b>	<b>Bucharest Stock Exchange</b>		
<b>Issuer</b>	<b>Number</b>	<b>Amount at the end of reporting period, BGN</b>	<b>Percentage of the total amount of assets</b>
Banca Transilvania SA	89 455	75 229	16.24%
Brd-Groupe Societe Generale	8 450	40 404	8.72%
Conpet SA Ploiesti	320	10 429	2.25%
Digi Communications NV	1 300	13 959	3.01%
Med Life SA	700	7 869	1.70%
Omv Petrom SA	658 100	82 533	17.82%
SC Fondul Proprietatea Sa	224 000	82 961	17.91%
Societatea Energetica Electrica	3 900	15 867	3.43%
Societatea Nationala De Gaze	3 850	44 892	9.69%
Societatea Nationala Nuclear	3 500	11 979	2.59%
Transelectrica SA	1 200	10 822	2.34%
Transgaz SA Medias	224	29 689	6.41%
<b>TOTAL</b>	<b>994 999</b>	<b>426 633</b>	<b>92.11%</b>

**Net profit/(loss) from financial assets held at fair value through profit and loss**

<i>BGN'000</i>	<b>01.01.2019</b>	<b>01.01.2018</b>
	<b>-</b>	<b>-</b>
	<b>31.12.2019</b>	<b>31.12.2018</b>
Expenses from transactions with financial assets held through profit and loss	-	17
Expenses from remeasurement of financial assets held through profit and loss	163	(85)
<b>Net profit/(loss) from financial assets held at fair value through profit and loss</b>	<b>163</b>	<b>(68)</b>
<b>Net loss from currency transactions</b>	<b>(19)</b>	<b>(18)</b>
<b>Net loss from financial assets</b>	<b>144</b>	<b>(86)</b>

## 7. Equity

The Fund's equity is equal to its Net Asset Value (NAV). The movement of shares and NAV of the Fund at the beginning and the end of the reporting period is as follows:

	Number of shares	Amount 31.12.2019	Number of shares	Amount 31.12.2018
<i>BGN'000</i>				
<b>As at 1 January 2019</b>	<b>270 000</b>	<b>462</b>	<b>60 150</b>	<b>117</b>
Issued new shares	1 160 000	2 684	239 850	470
Redeemed shares	(90 000)	(200)	(30 000)	(59)
Profit for the period	-	143	-	(66)
<b>As at 31 December 2019</b>	<b>1 340 000</b>	<b>3 089</b>	<b>270 000</b>	<b>462</b>
			<b>31.12.2019</b>	<b>31.12.2018</b>
Net asset value per share (in BGN)			<u>2.3055</u>	<u>1.7203</u>

### *Equity*

The Fund classifies the shares it issues as an equity instrument based on the following criteria:

Shares entitle its holder to a proportional share of the Fund's net assets at any time and in the event of the Fund being dissolved;

Shares issued by the Fund would not take precedence over other financial instruments in case of dissolution of the Fund;

Except for the contractual obligation of the Fund for redemption, the shares issued by the Fund do not impose any other contractual obligation to the Fund to provide cash or other financial assets or to exchange financial assets or financial liabilities;

The total amount of anticipated cash flow attributable to shares issued by the Fund at any time is based on profit or loss, the change in the recognised net assets or the change in the fair value of the recognised and written-off net assets of the Fund;

The Fund does not issue financial instruments other than shares.

### *Share premium account*

The Fund's assets are divided into shares. The nominal value of the shares is 1 (one) euro. The shares of the Fund are acquired at issue price. The number of Fund's shares changes as a result of their sale or redemption. The difference between the issue and nominal value of the shares in case of sale or redemption is recorded as share premium account.

### *Capital management*

The Fund's own equity is equal to the net asset value (NAV), which may not be less than BGN 500,000 or their equivalent. This minimum amount must be reached within two years of obtaining the authorisation from the Financial Supervision Commission to organise and manage the Fund. The Fund has already met this requirement.

Admission of the Fund to trading on a regulated market requires the minimum net asset value to be not less than BGN 100 000 or its Euro equivalent.

*Dividend policy*

The policy of the Fund is not to pay dividends. The dividends paid out of the shares in which the Fund has invested, and the capital gains realised in trading of the shares in the Fund, are reinvested.

**8. Net income per share**

	<b>01.01.2019 – 31.12.2019</b>	<b>01. 01.2018 - 31.12.2018</b>
Net loss per share in BGN	<u>(0.422)</u>	<u>(0.286)</u>

Net profit/(loss) per share is calculated by dividing the profit or loss for the period to be distributed among the shareholders (numerator) to the weighted average number of outstanding shares for the period (denominator).

The weighted average number of outstanding shares is 338 835 in 2019 (2018 – 230 000). The weighted average number is calculated by taking the arithmetic value of the outstanding shares for each day of the period.

**9. Trade and other liabilities**

<i>BGN,000</i>	<b>31.12.2019</b>	<b>31.12.2018</b>
Liabilities to Custodian bank and Management company	<u>3</u>	<u>1</u>
<b>Total trade and other liabilities</b>	<b><u>3</u></b>	<b><u>1</u></b>

**10. Income taxes**

The profit of the Fund is not subject to corporate tax.

**11. Group companies**

The Fund is a designated property without management bodies and the Management Company "Expat Asset Management" EAD carries out its management. The sole shareholder of the MC is "Expat Capital" AD. As at 31.12.2018, the Fund's group companies are the Management Company Expat Asset Management EAD and Expat Capital AD. Transactions with group companies are based on contractual terms and no guarantees are provided or received.

The expenses charged to the Management Company "Expat Asset Management" EAD (Note 4), accrued under the contracts concluded during the reporting period are:

- Remuneration under Management contract.

The following table provides information on the investment of Expat Mutual Funds in Expat Romania BET UCITS ETF:

Mutual Fund	Investment in:	Shares	Value at the end of the reporting period, BGN
MF Expat Global Bonds	Expat Romania BET UCITS ETF	22 001	50 991
MF Expat Developed Markets	Expat Romania BET UCITS ETF	12 388	28 711
MF Expat Emerging Markets	Expat Romania BET UCITS ETF	5 308	12 302

## 12. Financial instruments

### Fair values measurement

The fair value of the Fund's financial instruments is determined as the price that would have been received from the sale of a financial asset or paid upon transfer of a financial liability in a regular transaction between market participants as of the measurement date. The following methods and assumptions are used in measuring the fair value:

Closing price in an active market on the reporting date is used for quoted shares;

Cash and short-term deposits, trade receivables, trade payables and other current financial assets and liabilities, due to the short-term maturity of these financial instruments, their fair value approximates to the corresponding book value.

The following tables analyse the quantitative disclosures of the fair value hierarchy of financial instruments carried at fair value at the levels in which they fall:

#### As at 31 December 2019

<i>In BGN</i>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>	<b>Total</b>
<b>Financial assets</b>				
Conpet SA Ploiesti	10 416	-	-	10 416
Digi Communications NV	61 460	-	-	61 460
Transgaz SA Medias	132 341	-	-	132 341
Societatea Nationala Nuclear	54 579	-	-	54 579
Transelectrica SA	42 157	-	-	42 157
Med Life SA	22 940	-	-	22 940
Sphera Franchise Grouer SA	13 914	-	-	13 914
Purcari Wineries PLC	12 709	-	-	12 709
Societatea Energetica Electrica	93 657	-	-	93 657
OMV Petrom SA	480 375	-	-	480 375
SC Fondul Proprietatea SA	496 012	-	-	496 012
Banca Transilvania SA	487 713	-	-	487 713
BRD-Groupe Societe Generale	279 620	-	-	279 620
ALRO SA	37 509	-	-	37 509
Societatea Nationala De Gaze	271 782	-	-	271 782
Bursa de Valori Bucuresti SA	15 508	-	-	15 508
<b>TOTAL</b>	<b>2 512 692</b>	<b>-</b>	<b>-</b>	<b>2 512 692</b>

**12. Financial instruments (continued)**

**As at 31 December 2018**

<i>In BGN</i>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>	<b>Total</b>
<b>Financial assets</b>				
Banca Transilvania SA	75 229	-	-	75 229
BRD-Groupe Societe Generale	40 404	-	-	40 404
Conpet SA Ploiesti	10 429	-	-	10 429
Digi Communications NV	13 959	-	-	13 959
Med Life SA	7 869	-	-	7 869
OMV Petrom SA	82 533	-	-	82 533
SC Fondul Proprietatea SA	82 961	-	-	82 961
Societatea Energetica Electrica	15 867	-	-	15 867
Societatea Nationala De Gaze	44 892	-	-	44 892
Societatea Nationala Nuclear	11 979	-	-	11 979
Transelectrica SA	10 822	-	-	10 822
Transgaz SA Medias	29 689	-	-	29 689
<b>TOTAL</b>	<b>426 633</b>	<b>-</b>	<b>-</b>	<b>426 633</b>

**Risk profile and risk management**

***Risk profile***

The risk profile of the Exchange Traded Fund represents the amount and type of risk that the Management Company undertakes by investing the assets of the Fund, while seeking to replicate the Reference Index, which at the date of this Prospectus is the BET index of shares. In this respect, investing in shares of "Expat Romania BET UCITS ETF" involves undertaking a high risk, given that the Reference Index comprises of stocks.

In its operations, "Expat Romania BET UCITS ETF" is exposed to various types of risks, affecting its results.

***Credit risk***

The Fund owns cash and quoted shares and the level of exposure to credit risk mainly relates to cash held in current bank accounts. The credit risk associated with quoted shares is part of the total investment risk that shareholders of the fund are facing.

The main risks that investors face when they invest in shares "Expat Romania BET UCITS ETF" are:

***Market risk***

Probability of loss occurring from adverse changes in the securities prices, market interest rates, exchange rates and other. This market risk affects the net asset value of the Fund, which also varies due to changes in market prices of shares and other securities in which the Fund has invested. The Fund is not at risk of changes in market interest rates, as its financial assets are quoted shares.

**12. Financial instruments (continued)**

**Risk profile and risk management (continued)**

***Currency risk***

The Fund is created and traded in EUR and the reference index BET comprises of shares denominated and traded in Romanian leu. For this reason, the value of the financial assets of the Fund depends on the change in the rate of the Romanian leu versus euro and BGN respectively.

From 1 January 1999 the exchange rate of the Bulgarian lev (BGN) is pegged to the euro (EUR). The exchange rate is BGN 1.95583 / EUR 1.0.

It is not a policy of the Fund to hedge the currency risk. The currency risk is part of the total investment risk.

A 5% change in the currency rate of euro vs. Romania leu would have the following effect on the net asset value of the Fund, based on the Fund's portfolio as at 31.12.2019 and 31.12.2018:

**Effect on Profit/Loss**

*BGN'000*

	<b>As at 31.12.2019</b>	<b>As at 31.12.2018</b>
5% increase of Romanian leu vs. euro	154	23
5% decrease of Romanian leu vs. euro	(154)	(23)

***Extreme market movements***

The market price of the financial instruments in which the Fund invests may fluctuate due to changes in the economic and market environment, monetary policy of central banks, business activity of issuers, the sector in which the issuer operates and the demand and supply of the securities market. At certain times, the price of the shares on the market (stock exchange) can change substantially. In the event of major movements of the Index incl. large daily movements, the performance of the Fund may depart from its investment objectives. The revaluation of the Fund fluctuates due to changes in the value of the Fund's assets and the Reference Index.

A 5% change in market prices of assets would have the following effect on the net asset value of the Fund, based on the Fund's portfolio as at 31.12.2019 and 31.12.2018:

**Effect on Profit/Loss**

*BGN'000*

	<b>As at 31.12.2019</b>	<b>As at 31.12.2018</b>
5% increase of market prices	154	23
5% decrease of market prices	(154)	(23)

***Inability of the Management Company to adapt to market changes***

The fund follows a passive management strategy, i.e. it is not actively managed. Accordingly, the Management Company will not change the portfolio composition, except to follow closely the total return of the Reference Index. The Fund is not trying to "beat" the market and does not take defensive positions when the market falls or is regarded as overvalued. Therefore, decline in the Reference Index may lead to a decline in the value of the Fund's assets.

**12. Financial instruments (continued)****Risk profile and risk management (continued)*****Liquidity risk***

The risk associated with the probability of losses or profits by mandatory or forced sales of assets in adverse market conditions (such as lower demand in the presence of over supply). Liquidity risk is also in place when the Fund may need to buy back the shares of the investors.

The Fund invests in quoted shares, which under normal market conditions are quickly and easily saleable, which substantially reduces the exposure to this risk.

***Purchase and redemptions***

In case the purchase and redemption orders for shares are received late or do not meet the requirements of the Prospectus and the Fund Rules, there will be a delay between the date of placing the order and the actual date of purchase or redemption. Such postponements or delays may lead to a decrease in the number of shares or the amount of redemptions.

***Trading on a regular market***

There can be no assurances that trading shares of the Fund will be maintained or that the criteria of admission to trading will not be changed. Moreover, trading of the shares on a stock exchange may be suspended under the rules of the respective exchange due to market conditions and investors may not be able to sell their shares until trading resumes.

***Regulatory risk***

The prospectus has been prepared in compliance with the applicable laws and regulations. The Management Company and/ or the Fund and its investment objectives and policies may be affected by future changes in laws and regulations. New or modified laws, rules and regulations in Bulgaria or the European Union could prevent or significantly limit the Fund's ability to invest in certain instruments. They could also affect conclusion of agreements with certain third countries. This may affect the ability of the Fund to perform the relevant investment objectives and policies. Applying such new or modified laws, rules and regulations could lead to an increase of any or all of the Fund's costs and may require restructuring of the Fund, in order to meet the new rules. Such a probable restructuring may include restructuring costs. When restructuring is not possible, the Fund may proceed to termination.

The assets of the Fund and the Reference Index are subject to change in laws or regulations and such a change might affect their value and/ or liquidity.

***Operational risk***

A prospect of loss resulting from errors or system failures in the organisation, insufficiently qualified personnel and unfavourable external events that are not financial in nature (incl. legal risk). The Management Company shall determine a short and long-term strategy in managing the operational risks that arise in managing the business and the portfolio of the Exchange-Traded Fund listed in valuation and risk management Rules of the Fund.

**12. Financial instruments (continued)****Risk profile and risk management (continued)*****Risk of error in tracking the Reference Index***

Tracking the Reference Index by investing in all positions of the index can be costly and difficult to implement. Portfolio managers can use optimisation techniques such as selection of individual positions in the Index in proportions that differ from those in the Index. The use of such optimisation techniques can increase the error in tracking and lead to a different performance of the Fund in contrast to the Index. Furthermore, existing restrictions or future changes in laws and regulations of the Exchange-Traded Fund towards, but not limited to the composition, concentration and method of measurement of assets, can lead to inability of the Fund to replicate the index in full. In addition, exchange traded funds on markets characterised by low liquidity are exposed to a greater risk of error in tracking an index.

***Reference index***

If there is an event that affects the Index, the Fund may be required to suspend the purchase and redemption of shares. The revaluation of the Fund may also be affected. In case of continuing problems with the Index, the Fund will take appropriate actions, which may reduce the net asset value of the Fund.

***Systemic risks***

Systemic risks depend on general fluctuations in the economy and the markets in general. The Fund is unable to influence the systemic risks but will take them into account and will comply with them. Risks arising from political and economic situation are a possible instability or military action in the region. Disasters and accidents are factors complicating any system of risk management. The consequences are hard to predict, but access to information and applying a system of forecasting and actions in extreme situations are possible ways to mitigate the negative effect.

**13. Accounting policies and disclosures**

The Fund has applied continuously the significant accounting policies, presented below, for the period presented in this financial statement.

The accounting policies adopted in the preparation of the annual financial statements are consistent with the International Financial Reporting Standards (IFRS) adopted by the European Union. The Fund has not previously adopted other standards, interpretations or amendments that have been published but have not yet entered into force.

IFRS 16 Leasing in effect from 2019 has no impact on the annual report of the Fund.

The Fund recognizes a financial asset or financial liability in the Statement of Financial Position only when the Fund enters into a contract on this instrument.

***Classification and measurement***

Under IFRS 9, after initial recognition, debt instruments are reported at fair value through profit or loss, amortised cost or at fair value in other comprehensive income. The classification is based on two criteria: asset management business model of the fund and whether the contractual cash flows of the instrument represent 'only payments of principal and interest' on the outstanding amount of the principal.

### **13. Accounting policies and disclosures (continued)**

The assessment of the Fund's business model is performed at the date of initial application, i. e. 4 January 2018. The assessment whether contractual cash flows on debt instruments consist only of principal and interest, is made based on the facts and circumstances of the initial recognition of assets.

The requirements for classification and measurement of IFRS 9 do not have a material impact on the Fund and it continues to recognise at fair value all financial assets previously reported at fair value under IAS 39.

In order to determine the classification and measurement category under IFRS 9, all financial assets, except for equity instruments and derivatives, should be valued based on a combination of the asset management business model and the contractual cash flow characteristics of the instruments.

The categories of financial asset valuation are as follows:

Trade receivables and Other non-current receivables (i.e. receivables from group companies, receivables on credits, etc.) classified as Trade receivables and Trade and other non-current receivables as at 31 December 2019 are held for the purpose of obtaining the contractual cash flows and lead to cash flows representing only principal and interest payments. As of 1 January 2018, they are classified and measured as Debt instruments at amortised cost.

#### **13.1. Financial instruments**

As of 1 January 2019, quoted capital investments are classified as financial instruments at fair value through profit or loss.

##### ***Business Model Assessment***

The Fund defines the following business models for the management of financial assets:

A business model that aims to hold assets to match contractual cash flows. It includes assets that are managed with intention to collect the contractual payments throughout the term of the instrument;

A business model that aims to realise cash flows by selling the asset. The model includes financial assets, whose current fair value the Fund intends to monitor and the current fair value is the basis of the decisions to execute sale and purchase transactions; there is evidence of active purchase and sale activity; the contractual cash flows from the asset are not composed solely of principal and interest payments; the collection of contractual cash flows from such assets is only in addition to achieving the principal objective of realising cash flows from sales.

##### ***Categories of measurement of financial assets and liabilities***

The Fund classifies and measures its portfolio at fair value through profit or loss as it is held in a business model within which a fair value measurement is made through profit or loss, and the Fund manages the financial assets for the purpose of realising cash flows through sale of assets.

The Fund classifies its receivables at amortised cost as they are held within a business model whose purpose is to hold assets in order to collect the contractual cash flows. The Fund classifies its financial liabilities as trade payables measured at amortised cost.

**13. Accounting policies and disclosures (continued)****13.1. Financial instruments (continued)*****Financial assets and liabilities******Trade receivables and liabilities (amortised cost)***

Trade receivables and payables include non-derivative financial assets with fixed or determinable payments that were not quoted in an active market other than those:

- which the Fund intends to sell immediately or in the near future;
- which the Fund has, at initial recognition, determined at fair value through profit or loss or as
- available for sale;

for which the Fund cannot substantially recover all of its initial investment for reasons unrelated to a deterioration in the exposure designated as available for sale.

***Financial assets and financial liabilities at fair value through profit or loss***

Financial assets and financial liabilities in this category are those that are not held for trading or are required to be measured at fair value through profit or loss under IFRS 9. Upon initial recognition, the Management Company determines an instrument at fair value through profit or loss when one of the following criteria is met. This categorisation is defined at instrument level:

This determination eliminates or significantly reduces inconsistent measurement that would otherwise arise from measuring assets or liabilities, or from recognising gains or losses on a different basis, or;

Liabilities are part of a group of financial liabilities (or financial assets or both) that are managed and their performance is measured on a fair value basis in accordance with documented risk management or investment strategy, or;

Liabilities that contain one or more embedded derivatives, unless they significantly change the cash flows that would otherwise be required under contract or it is clear that such a division of the embedded derivative(s) is prohibited.

Financial assets and financial liabilities at fair value through profit or loss are recognised in the balance sheet at fair value. Changes in fair value are recognised in profit or loss.

Income from dividends from equity instruments at fair value through profit or loss is recognised in profit or loss as income when the payment entitlement is established.

***Impairment of financial assets***

IFRS 9 requires the Fund to report an adjustment for expected credit losses for all financial assets that are not held at fair value through profit or loss. The adjustment is based on the expected losses associated with the probability of default over the next twelve months unless there has been a significant increase in credit risk after the asset has been acquired.

The Management Company performs periodic review of indications for impairment of the book value of the Fund's assets as follows: receivables - at the end of each month when preparing the monthly financial statements for the management;

The Fund applies a simplified impairment approach for trade receivables where the credit loss adjustment is determined based on the anticipated credit loss for the entire duration of the instrument.

### **13. Accounting policies and disclosures (continued)**

#### **13.1. Financial instruments (continued)**

The choice of the Simplified Approach is a consequence of the specificities of these financial assets and the matrix for determining the anticipated credit loss for these financial assets is mainly based on default arrears in terms of loss in default, including the future development of macroeconomic indicators.

Financial assets is classified into three phases, which changes in the credit quality of the counterparty/ instrument:

- Phase 1 ("regular") - classified financial assets with no indication of an increase in credit risk over the original valuation.
- Phase 2 ("impaired service") - classifies financial assets with a significant increase in credit risk but without objective evidences of impairment/ loss basis ('in default');
- Phase 3 ("in default") - it classifies financial activity with a significant increase in credit risk and with actual evidences of impairment ('default' activated).

The recoverable amount of the asset is calculated where there is indication of impairment. Impairment loss is determined as a difference between the carrying amount of the financial asset and its estimated recoverable amount and are recognised in profit or loss. When subsequent events result in reduction in previously recognised impairment loss, the adjustment is reported through profit or loss.

#### ***Derivatives measured at fair value through profit or loss***

The Fund does not enter into derivative transactions.

#### ***Financial assets or financial liabilities held for trading***

The Fund does not report financial assets or financial liabilities as held for trading.

#### ***Date of recognition***

Financial assets and liabilities, with the exception of loans and advances, are initially recognised at the date of transaction, i.e. on the date on which the Fund becomes a party to the contractual provisions of the instrument.

#### ***Initial recognition of financial instruments***

Upon initial recognition, the fund's financial assets are classified as such that are subsequently measured at fair value through profit or loss.

The financial asset management business model of the Fund refers to the way it replicates the BUX Reference index, regardless of its direction. The business model determines whether cash flows will arise as a result of the collection of contractual cash flows, sale of financial assets, or both.

The purchase or sale of financial assets, whose conditions require delivery of the assets within a given period of time, usually established by a regulation or current practice in the relevant market (regular purchases), are recognised at the date of the transaction (trade), i.e. the date on which the Fund committed to buy or sell the asset.

Upon initial recognition, the Fund measures the receivables that do not have a significant financing component at the relevant transaction price.

**13. Accounting policies and disclosures (continued)****13.1. Financial instruments (continued)*****Subsequent measurement***

Financial assets at fair value through profit or loss

Financial assets at fair value through profit or loss include financial assets held for trading and financial assets designated at their initial recognition as such at fair value through profit or loss, or financial assets that are required to be measured at fair value. Financial assets are classified as held for trading if they are acquired for sale or re-acquisition within a short period. Financial assets with cash flows that are not only principal and interest payments are classified and measured at fair value through profit or loss, regardless of the business model. Notwithstanding the criteria for debt instruments that are to be classified at amortised cost or at fair value in other comprehensive income, as described above, debt instruments may be designated as such at fair value through profit or loss on initial recognition, if the accounting mismatch is eliminated or significantly reduced.

Financial assets at fair value through profit or loss are reported in the balance sheet at fair value, with net changes in fair value being recognised in the profit and loss account.

This category includes derivative instruments and equity instruments listed on stock exchanges that the Fund has not irrevocably chosen to classify as such at fair value in other comprehensive income. Dividends on such equity instruments are also recognised as other income in the profit and loss account when the entitlement of receiving the payment has been established.

***Write-off of financial assets and liabilities***

A financial asset (or, where applicable, part of a financial asset or part of a group of similar financial assets) is written-off (i.e. removed from balance sheet of the Company), mainly when:

- the rights to receive cash flows from the asset have expired; or
- the rights to receive cash flows from the asset have been transferred or the Fund is responsible to pay in full received cash flows without significant delay to a third party through a transfer agreement, under which either (a) the Fund has transferred substantially all the risks and benefits of ownership of the asset; or (b) the Fund has neither transferred nor retained substantially all the risks and benefits of ownership of the asset but has not retained the control on it.

Where the Fund has transferred its rights to receive cash flows from the asset or has entered into a transfer agreement, it shall assess whether and to what extent it retains the risks and benefits of the ownership.

When the Fund has neither transferred, nor retained substantially all the risks and benefits of the ownership of the financial asset, nor transferred control of the financial asset, it continues to recognise the transferred asset to the extent of its continuing involvement in the financial asset. In this case, the Fund also recognises the related liability. The transferred asset and the related liability are measured on a basis that reflects the rights and liabilities that the Fund has retained.

Continued interest in the form of a guarantee on the transferred asset is measured at the lower of the initial carrying amount of the asset and the maximum amount of consideration that the Fund may be required to pay.

**13. Accounting policies and disclosures (continued)****13.1. Financial instruments (continued)*****Compensation of financial assets and liabilities***

Financial assets and liabilities are netted and the net amount is recognised in the balance sheet when the Fund has a legally enforceable right to net the recognised amounts and the transactions are intended to be settled on a net basis.

**13.2. Fair value valuation**

The Fund measures its investments in financial instruments, such as equity instruments, bonds and other interest-bearing investments at fair value at each reporting date.

Fair value is the price that would be received for the sale of an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The measurement of fair value is based on the assumption that the sale of the asset or the transfer of the liability is made either on the principal market of the asset or liability or, in the absence of a principal market, on the most advantageous market for the asset or liability. The principal or most advantageous market must be accessible to the Fund. The fair value of an asset or liability is measured considering the assumptions that a market participant, acting in their economic best interest, would use when pricing the asset or a liability.

The fair value of financial instruments traded in active markets is based on their quoted price, gross of transaction costs. For all other financial instruments that are not traded in an active market, fair value is determined using valuation techniques that are considered appropriate in the circumstances. Valuation techniques include the market approach (i.e. with the help of latest market transactions adjusted for the needs and referring to the current market value of another instrument, which is the same in essence) and income approach (i.e. discounted cash flows analysis and option pricing models which make use of existing and confirming market data).

For assets and liabilities that are measured at fair value on a periodic basis, the Fund determines transfers between levels in the hierarchy through a revaluation of the categorisation (based on the lowest level that is important for measuring fair value as a whole) and considers, that the transfers

**13.3. Functional and reporting currency**

The functional currency is the currency of the primary economic environment in which the Fund operates. The shares of the Fund are issued in EUR, the net asset value per share and redemption price are calculated in EUR. For this reason, the functional currency of the Fund is EUR.

These financial statements are presented in BGN, All financial information in BGN is rounded to one thousand unless otherwise stated.

From 1 January 1999 the exchange rate of the Bulgarian lev (BGN) is pegged to the euro (EUR). For this reason, there are no currency translation differences arising from the use of the BGN as a presentation currency in these financial statements. The exchange rate is BGN 1.95583 / EUR 1.0.

**13.4. Transactions in foreign currency**

Transactions carried out in foreign currencies are translated into BGN at BNB official exchange rates on the day of transaction. All assets and liabilities denominated in foreign currencies are remeasured on a daily basis.

**13. Accounting policies and disclosures (continued)****13.5. Rules for Determining the Net asset value of the Fund**

The net asset value is the total value of all portfolio assets less all liabilities. The Fund applies rules for determining the net asset value, and the developed methodology for determining the net asset value is based on:

- the relevant provisions of the Fund's rules and prospectus;
- the relevant legal provisions and regulations for their implementation;
- the relevant provisions of the accounting legislation;
- the application of generally accepted measurement methods.

The net asset value per share is the basis for determining the subscription and redemption value per share of the Fund. Issued shares are reported at nominal value. The Fund's net asset value per share is calculated as the net asset value divided by the number of shares issued.

**13.6. Expenses**

Expenses are recognised in profit or loss for the period in which they arise, regardless of cash payments. All expenses related to the Fund's activities, including the remuneration of the Management Company and the Custodian Bank, are recognised in profit or loss on an accrual basis.

The direct costs of shareholders related to the purchase and redemption of shares of the Fund are specified in the Prospectus of the Fund.

***Fees and commissions***

Fees and commissions expenses are recognised in profit or loss when the corresponding services are performed.

**13.7. Taxes**

The Fund, as a collective investment scheme, admitted to public offering in the Republic of Bulgaria, enjoys preferential tax treatment and its profits are not subject to corporate tax.

**13.8. Share capital. Issue and redemption of shares**

The share capital is represented at the nominal value of the Fund's issued and paid shares.

The Fund issues shares at issue value every business day. The issue value per share is formed by the net asset value per share plus the issue costs. The difference between the net asset value per share and the nominal value per share is reported as share premium reserves. Depending on whether the Fund issues its share below or above nominal value, the difference to the nominal value is indicated respectively as a discount or a positive share issue premium. The Fund has the obligation to buy back its shares from their unitholders.

**13.9. Cash and cash equivalents**

Cash and short-term deposits in the balance sheet include cash in bank accounts, cash and short-term deposits with an initial maturity of three months or less. For the purposes of the cash flow statement, cash and cash equivalents include cash and cash equivalents as defined above.

#### **14. Changes in accounting policies and disclosures**

The Fund has consistently applied the significant accounting policies presented below for the period presented in these annual financial statements.

The accounting policies adopted in the preparation of the annual financial statements are in accordance with the International Financial Reporting Standards (IFRS) adopted by the European Union. The Fund has not previously adopted other standards, interpretations or amendments that have been published but have not yet entered into force.

##### **IFRS 16: Leases**

The Fund applies IFRS 16 for the first time. The adoption of the standard has no impact on the Fund's annual financial statements.

IFRS 16 was published in January 2016 and replaces IAS 17 Lease, IFRIC 4 Determining whether an arrangement contains a lease, SIC-15 Operating lease incentives and SIC-27 Assessing the content of transactions involving the legal form of a lease. IFRS 16 establishes the principles of recognition, measurement, presentation and disclosure of a lease and requires lessees to recognise all leases under the same pattern of accounting as the accounting for finance lease under IAS 17. The Standard includes two exemptions from recognition for Leases - lease of "low value" assets (i.e. personal computers) and short-term lease (i.e. leases with a term of up to 12 months). Upon the commencement date of the lease, the lessee recognises an obligation to make lease payments (i.e. a lease liability) and an asset that represents the right to use the underlying asset over the lease term (i.e. a right of use). Lessees will be required to recognise a separate expense for interest on the lease and amortisation expense of the asset for the right of use.

In addition, lessees will be obliged to remeasure the lease liability when certain events occur (i.e. change in the lease term, change in future lease payments resulting from a change in the index or remeasurement used to determine those payments). In principle, the lessee will recognise the amount of the remeasurement of the lease liability as remeasurement of the asset for the right of use. The Fund has adopted IFRS 16 with a modified retrospective method of application starting on 1 January 2019. Under this method, the standard is applied retrospectively and the cumulative effect of its initial application is recognized on the date of the initial application.

Under IFRS 16, the lessor's accounting is substantially unchanged from that applied to date under IAS 17. Lessors will continue to classify the lease agreements in applying the same classification principle as defined in IAS 17 and distinguish between both types of leasing: operating and finance lease.

IFRS 16, which enters into force for annual periods beginning on or after 1 January 2019, requires lessees and lessors to make more enhanced disclosures than those under IAS 17. Lessors will continue to classify lease contracts as in IAS 17, and to distinguish between the two types of leasing: operating and financial leasing. IFRS 16, effective for annual periods beginning on or after 1 January 2019, requires lessees and lessors to make more extensive disclosures than those under IAS 17.

##### **IFRIC 23: Uncertainty over income tax treatment**

This clarification comes into effect for annual periods beginning on or after 1 January 2019 and early application is allowed. The clarification takes into account accounting treatment of income taxes when tax treatment is related to uncertainty about the application of IAS 12. The clarification provides guidelines about uncertain tax treatment, tax inspection, applicable method incorporating uncertainty and accounting treatment of facts and circumstances. Changes do not affect the Fund's financial position and results.

**14. Changes in accounting policies and disclosures (continued)**

***IFRS 9: Financial instruments: classification and measurement (Amendments): Characteristics of early repayment with negative compensation***

The amendments in force for annual periods beginning on or after 1 January 2019, allowing for their earlier application, propose a change to IFRS 9 for specific financial assets that would otherwise have contractual cash flows that are only principal and interest payments but do not meet the eligibility condition, only as a result of the existence of early repayment characteristics with negative compensation. In particular, for financial assets with early repayment characteristics that could result in negative compensation, the amendments require the financial asset to be measured at amortised cost or at fair value through other comprehensive income, depending on the business model's assessment, within which it is held. These changes are not expected to affect the financial position or performance of the Fund.

***IAS 28: Investments in Associates (Amendments): Long-term participations in associated and joint ventures***

The amendments shall be effective for annual periods beginning on or after 1 January 2019, allowing their earlier application. The amendments clarify that IFRS 9 Financial Instruments is applicable to long-term interests in associates and joint ventures that are, by their nature, part of the net investment in associates or joint ventures but to which the equity method does not apply. An entity applies IFRS 9 to those long-term participations before applying IAS 28.

When applying IFRS 9, the entity does not take into account adjustments in the carrying amount of long-term interests that arise from the application of IAS 28. These changes are not expected to affect the financial position or performance of the Fund.

***IAS 19: Employee Benefits (Amendments): Amendments, redundancies and arrangements of the plan***

The amendments shall be effective for annual periods beginning on or after 1 January 2019, allowing their earlier application. The amendments require entities to use updated actuarial assumptions to determine current service cost and net interest for the remaining period of the annual reporting period after the change in plan, redundancy or arrangement. In addition, the amendments clarify how the accounting for the change in plan, redundancy or arrangement affects the asset ceiling requirements. The amendments have no effect on the financial result of the Fund.

***Annual improvements to IFRS Cycle 2015-2018***

In the 2015-2018 year cycle of the draft IFRS annual improvements, the IASB has published amendments that will enter into force for annual periods beginning on or after 1 January 2019. A summary of the amendments to the relevant standards is presented below:

- IFRS 3 Business Combinations and IFRS 11 Joint Arrangements – Clarification of accounting for previously held shares in joint operations;
- IAS 12 Income Taxes – Clarification of the impact of taxes on income from payments in respect of financial instruments classified as equity;
- IAS 23 Borrowing costs – Clarification of borrowing costs eligible for capitalisation.

The improvements above do not affect the financial position or performance of the Fund.

**15. Published standards that are not yet in force and have not been adopted earlier**

Listed below are the published standards that are not yet effective or have not been adopted earlier by the Fund at the date of these financial statements. It is disclosed how, to a reasonable extent, the disclosures, financial position and operating results are expected to be influenced when the Fund adopts these standards for the first time. This is expected to happen when they come into effect.

***IFRS 17: Insurance Contracts***

The standard enters into force for annual periods, beginning on or after 1st of January 2021, allowing for earlier application, provided that the Fund also applies IFRS 15 Revenue from Contracts with Customers and IFRS 9 Financial Instruments. IFRS 17 Insurance Contracts establishes the principles for the recognition, measurement, presentation and disclosure of insurance contracts issued. It also requires similar principles to be applied to reinsurance contracts and investment contracts with additional, non-guaranteed income. The purpose of the standard is to require funds to provide information, related to insurance contracts in a manner that accurately reflects those contracts.

This information is provided with a database on the use of financial results to evaluate the performance of contracts, available within the scope of IFRS 17 to view the financial position, financial searches and cash flows of the Fund. The standard is no longer accepted by the EU. This is not applicable to the Fund.

***IFRS 3 Business Combinations (Amendments): Definition of Business***

The amendments are effective for annual periods, beginning on or after 1st of January 2020, allowing for earlier implementation. The amendments clarify minimum business requirements and limit the definition of business. The amendments also cover the assessment of whether market participants are able to change the missing elements, provide guidance, support the backgrounds, used in the assessment, allow the process to be presented and an optional fair value concentration test introduced. These amendments have not yet been adopted by the EU. The Fund will analyse and evaluate the effects of changes on its financial position or results of operations.

***Amendments in IAS 1 Presentation of Financial Statements and IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors: Definition of Materiality***

The amendments are effective for annual periods, beginning on or after 1st of January 2020, allowing for earlier implementation. The amendments clarify the definition of materiality and how it should be applied by providing practical guidance, that has been included in other IFRSs. The changes also clarify, that materiality depends on the nature and significance of the information. The Fund will analyse and evaluate the effects of changes on its financial position or results of operations.

***Conceptual framework for financial reporting***

The IASB published the Revised Conceptual Financial Reporting Framework on March 29, 2018, effective for annual periods beginning on or after 1 January 2020. The conceptual framework presents the concepts of financial reporting, development of standards, guidance on the production of consistent accounting policies and guidelines for understanding and interpreting standards. The major changes introduced in the Revised Conceptual Financial Reporting Framework relate to the concept of assessment, including the factors to be taken into account when selecting an assessment basis and the concept of presentation and disclosure, including which income and costs are classified in other comprehensive income. The conceptual framework also provides updated definitions of asset and liability and criteria for their recognition in the financial statements. The Fund will analyse and evaluate the effects of the changes on the financial position or performance.

**15. Published standards that are not yet in force and have not been adopted earlier (continued)*****Reform of benchmarks for the highest percentages - IFRS 9, IAS 39 and IFRS 7 (Amendments)***

The amendments are in force for annual periods, beginning on or after 1st of January 2020 and must be applied retrospectively. Earlier application is also permitted. In September 2019, the International Accounting Standards Board (IASB) published amendments to IFRS 9, IAS 39 and IFRS 7, ending phase 1 of its work in response to the effects on financial reporting of interbank interest rate reform. Phase 2 will focus on problems that may arise when interest rates are replaced by risk-free interest rates. The changes posted address issues, that occur while replacing existing interest rates with alternative interest rates. The effects on specific cases of hedge accounting under IFRS 9 Financial Instruments and IAS 39 Financial Instruments are addressed: Recognition and evaluation, that require future-oriented analysis.

The amendments provide temporary relief, applicable to hedging requirements, where compliance with these requirements is directly influenced by the benchmark reform. The changes allow the hedge accounting to continue in the uncertainty period until the replacement of existing benchmark interest rates with alternative risk-free interest rates. Amendments to IFRS 7 Financial Instruments have also been made: Disclosures requiring the submission of additional information on hedge uncertainty resulting from the reform. The Fund will analyse and evaluate the effects of changes on its financial position or results of operations.

**16. Contingent liabilities and assets**

The Fund does not recognise contingent liabilities and contingent assets in its financial statements due to the fact that there are no potential liabilities for which it has not yet been ascertained whether the Fund has any current liabilities or their possible recognition may lead to recognition of income that may never be realised.

**17. Events after the reporting period**

By decision of the sole owner of the capital of Expat Asset Management EAD from 09.01.2020, Nikola Emilov Veselinov was dismissed as a member of the Board of Directors of Expat Asset Management EAD. The change was entered in the Commercial Register on 16.01.2020. By decision of the sole owner of the capital of Expat Asset Management EAD from 16.03.2020, Maria Dimitrova Boychinova was dismissed as a member of the Board of Directors of Expat Asset Management EAD. The change was entered in the Commercial Register on 27.03.2020. No new members of the Board of Directors were elected.

***COVID 19 – Global pandemic***

Expat Asset Management EAD has long been using cloud-based information systems and resources in the Internet. This includes the COMENS system for operations registration and portfolio management (both trustees and funds), Microsoft's cloud-based corporate electronic communications services (e-mail, chatrooms, online conference calls, file sharing), cloud file servers as well as online platforms for electronically signing documents. All company employees have personal electronic signatures, issued by Evrotrust, that can sign documents at any time from laptops, mobile phones or tablets. All employees of the company have "smart" phones with corporate e-mail installed, Microsoft OneDrive file sharing system, Viber and Skype chat and video conferencing programs, and the Evrotrust electronic signature application. The Portfolio Management department has two mobile subscriptions for Bloomberg Anywhere terminals, that can monitor the markets at any time from anywhere from a tablet, laptop or mobile phone, as well as give orders to buy and sell financial instruments to the company's investment intermediaries worldwide.

**17. Events after the reporting period (continued)**

Since the announcement of a state of emergency in Bulgaria, the company has been working with a reduced staff in the office, only the "Portfolio management" staff are on duty. The other employees work remotely from their homes without any problems, as this does not in any way halt the work of managing clients and funds portfolios, does not in any way disrupt the communication with clients and counterparties. There are limited meetings with outsiders in the office, but the company has made available to its clients the possibility to sign documents electronically, with all documents submitted in Eurotrust, which guarantees the identity of the counterparty. The company can also open remote investment accounts (sign trust agreements) for new clients by setting up a portal through its website. A procedure for remote electronic collection of necessary information and documentation, and identification and authentication of new customers has been established. Risk management monitoring of all processes and results in managing trust and equity portfolios continues uninterrupted.

Expat Asset Management does not expect directly significant impact of the COVID-19 epidemic on its operations and financial position. If the epidemic leads to a deep and prolonged global recession, leading to a significant decline in financial markets, it could worsen the company's revenue prospects and profits - as well as that of any other firm in the sector - in the medium-term.

For the purposes of the 2019 Annual Financial Statement, the management estimates the effect of Covid-19 as a non-adjusting event, occurring after the balance sheet date.

The performance of the Fund (as measured by the change of the "net asset position per share or per unit") is directly affected by the price movement of financial instruments in the Fund's portfolio. In this sense, if the global economic crisis created by the measures against COVID-19, affects negatively the financial markets and especially the market prices of the instruments in the portfolio of the fund, this will also adversely affect the performance of the fund. This is a purely market risk that is properly described in the prospectus of the Fund and is not operational or extraordinary. The duration and depth of the financial crisis caused by the measures against COVID-19 cannot be predicted. It can be predicted that the market risk, measured as volatility in global financial market prices, will increase. Outside of increasing market risk, the COVID-19 situation is not expected to have any other impact on the Fund's operations and results.